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Sent: Tue 11/6/2012 6:11:51 PM
Subject: guidance from state board on written comments and presentations
<http://www.epa.gov/sfbaydelta>

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From: Erin Foresman/R9/USEPA/US
Date: 09/13/2012 08:31PM
Subject: guidance from state board on written comments and presentations

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I work a part time schedule (M 7:30a - 4:00p, T - F 7:30a - 2:00p)

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From: "Brock Bernstein" <brockbernstein@sbcglobal.net>

Date: 09/13/2012 04:45PM

Cc: "Valerie Holcomb" <Valerie.Holcomb@icfi.com>

Subject: More Bay Delta guidance

Following the first workshop last week, I've had some discussion with a few of you as well as with Board members and staff about how to ensure the materials you submit in writing and present at the workshops address their needs in particular, but also all parties' interest in having a concise summary of existing knowledge and a well thought out set of alternatives as a basis for future discussion and decision making.

To that end, the following is a slightly edited version of some more detailed guidance I have received from Board staff:

Presentations should focus on the specific changes the Board should be considering to the Bay-Delta Plan to protect fish and wildlife beneficial uses and why, with the "why" explaining the scientific and technical basis for proposals. Presentations should also identify the specific goal(s) (which could be species specific or not) of proposed changes to the Plan, how well the proposal will meet the goal(s), and the degree of certainty associated with the proposals. The first workshop made clear that the Board has little interest in hearing that there is not sufficient knowledge to proceed. This is because fish and wildlife beneficial uses are not being fully protected and the Board therefore needs to hear suggestions about how to address the need for increased protection.

Rather than simply "punching the uncertainty button," participants should be assisting the Board in discussing how to adaptively manage to address uncertainty, including identifying logical starting points. There will obviously be different opinions about when and how to proceed and such differences provide useful starting points. For

example, one perspective is to base decisions on the precautionary principle, assume that more flow is needed to protect fish, and allow for flexibility only when concrete information shows that a lesser amount would be as protective. An alternative perspective is that no action should be taken until it is possible to more accurately quantify costs and benefits and we can be assured the action will meet a specific, quantifiable goal. In either case, it will further the discussion to hear how different proposed approaches are considered to be more / less protective or certain.

The Board also understands that flow alone is not the answer to protecting fish and wildlife beneficial uses. However, it is a component of the system the Board is considering modifying in this proceeding and they therefore need to hear what flows, exports, etc. are needed to make proposals viable. Any discussion of flows should also be framed in the context of other potential changes to the system (e.g., BDCP, climate) and in the absence of such changes.

I hope this helps. I know that the last round of submittals and presentations did include some concrete suggestions and recommendations. I think what we're hearing is that these need to receive relatively more emphasis and attention, and that your presentations should be organized around the recommendations rather than around a more straightforward description of the science.

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